

EXHIBIT C

From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Friday, October 06, 2017 10:05 AM
To: Levine, Matthew (DFS)
Subject: RE: Call

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Sounds good does 11:30 am Tuesday work?

ERIC TIRSCHWELL | DIRECTOR OF LITIGATION AND NATIONAL ENFORCEMENT POLICY
ETIRSCHWELL@EVERYTOWN.ORG 646-324-8222

EVERYTOWN FOR GUN SAFETY
EVERYTOWN.ORG | [@EVERYTOWN](https://twitter.com/EVERYTOWN)

From: Levine, Matthew (DFS) [mailto:Matthew.Levine@dfs.ny.gov]
Sent: Friday, October 06, 2017 9:32 AM
To: Eric Tirschwell
Subject: Re: Call

Good to hear from you

I'm in court today could we try Tuesday?

Cary gave me the materials for your group and I hope to review this weekend

Best

Sent from my iPhone

On Oct 6, 2017, at 9:11 AM, Eric Tirschwell <etirschwell@everytown.org> wrote:

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Hey Matt, hope you are doing well, do you have 10 minutes for a quick call today? Thanks.

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From: Eric Tirschwell <etirschwell@everytown.org>
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Subject: Call

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From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Friday, October 06, 2017 1:36 PM
To: Levine, Matthew (DFS)
Subject: RE: Call

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Some recent press.

<http://www.npr.org/2017/10/05/555859571/nra-backed-gun-laws-have-found-success-in-state-legislatures-across-the-u-s>

(discussion of Carry Guard toward the end)

<http://www.philly.com/philly/blogs/inq-phillydeals/gun-insurance-nra-chubb-sell-protection-for-shooters-20171004.html>

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From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Tuesday, October 17, 2017 12:10 PM
To: Levine, Matthew (DFS)
Subject: RE: Call

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Here now

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-----Original Message-----

From: Levine, Matthew (DFS) [mailto:Matthew.Levine@dfs.ny.gov]
Sent: Tuesday, October 17, 2017 12:04 PM
To: Eric Tirschwell
Subject: RE: Call

For a minute, yes.

Matthew L. Levine
Executive Deputy Superintendent -- Enforcement

New York State Department of Financial Services One State Street Plaza Executive Division, 19th Floor New York, NY
10004-1511
212-709-5461 matthew.levine@dfs.ny.gov

www.dfs.ny.gov

-----Original Message-----

From: Eric Tirschwell [mailto:etirschwell@everytown.org]
Sent: Tuesday, October 17, 2017 11:56 AM
To: Levine, Matthew (DFS) <Matthew.Levine@dfs.ny.gov>
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Can we do 1210?

> On Oct 17, 2017, at 10:29 AM, Levine, Matthew (DFS)

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You can call my number below.

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Yep

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Matthew L. Levine
Executive Deputy Superintendent -- Enforcement

New York State Department of Financial Services One State Street Plaza Executive Division, 19th Floor New York, NY
10004-1511
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Sent: Thursday, October 19, 2017 5:05 PM
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From: Eric Tirschwell <etirschwell@everytown.org>

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<http://www.nydailynews.com/news/national/ad-blast-nra-murder-insurance-people-shoot-article-1.3574483>

<http://abcnews.go.com/US/wireStory/murder-insurance-protection-defense-cases-50581815>

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-----Original Message-----

From: Levine, Matthew (DFS) [<mailto:Matthew.Levine@dfs.ny.gov>]

Sent: Thursday, October 19, 2017 4:44 PM

To: Eric Tirschwell

Subject: Re: Call

The link doesn't exist
Possible to PDF to me?

Sent from my iPhone

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> <http://www.sfchronicle.com/news/crime/article/Murder-Insurance-or-protection-in-self-defense-12289886.php>

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<http://www.nydailynews.com/news/national/ad-blast-nra-murder-insurance-people-shoot-article-1.3574483>

<http://abcnews.go.com/US/wireStory/murder-insurance-protection-defense-cases-50581815>

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Yep want to call my desk # below?

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From: Levine, Matthew (DFS) [mailto:Matthew.Levine@dfs.ny.gov]
Sent: Thursday, October 19, 2017 5:24 PM
To: Eric Tirschwell
Subject: Re: Call
Got a second to discuss?

From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Thursday, October 19, 2017 4:46:37 PM
To: Levine, Matthew (DFS)
Subject: RE: Call

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

<http://www.nydailynews.com/news/national/ad-blast-nra-murder-insurance-people-shoot-article-1.3574483>

<http://abcnews.go.com/US/wireStory/murder-insurance-protection-defense-cases-50581815>

ERIC TIRSCHWELL | DIRECTOR OF LITIGATION AND NATIONAL ENFORCEMENT POLICY
ETIRSCHWELL@EVERYTOWN.ORG 646-324-8222

EVERYTOWN FOR GUN SAFETY
EVERYTOWN.ORG | **@EVERYTOWN**

-----Original Message-----

From: Levine, Matthew (DFS) [mailto:Matthew.Levine@dfs.ny.gov]
Sent: Thursday, October 19, 2017 4:44 PM
To: Eric Tirschwell
Subject: Re: Call

The link doesn't exist
Possible to PDF to me?

Sent from my iPhone

> On Oct 19, 2017, at 4:13 PM, Eric Tirschwell <etirschwell@everytown.org>
wrote:

>

> ATTENTION: This email came from an external source. Do not open
attachments or click on links from unknown senders or unexpected emails.

>

>

> FYI.

>

>

<http://www.sfchronicle.com/news/crime/article/Murder-insurance-or-protecti>

> on-in-self-defense-12289886.php

From: Levine, Matthew (DFS)
Sent: Thursday, October 19, 2017 5:24 PM
To: Eric Tirschwell
Subject: Re: Call

Got a second to discuss?

From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Thursday, October 19, 2017 4:46:37 PM
To: Levine, Matthew (DFS)
Subject: RE: Call

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FYI.

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From: Loconte, Richard (DFS)
Sent: Tuesday, October 24, 2017 1:36 PM
To: etirschwell@everytown.org

Hi Eric, Matt Levine provided me your email and suggested I reach out. Regarding our investigation into NRA and Carry Guard, would you be open to having me send media inquiries your way if we start getting calls?

Regards,
Rich

Richard Loconte
Executive Deputy Superintendent
Communications and Strategy

New York State Department of Financial Services
One State Street
New York, NY 10004
212.709.1690 | richard.loconte@dfs.ny.gov

www.dfs.ny.gov

Sent: Tuesday, October 24, 2017 1:19 PM
To: etirschwell@everytown.org

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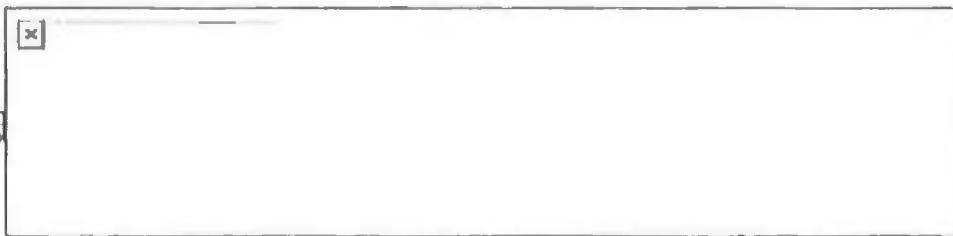
www.dfs.ny.gov

From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Wednesday, October 25, 2017 4:33 PM
To: Loconte, Richard (DFS)
Subject: FYI

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If you're having trouble viewing this email, you may [see it online](#).

Share this:



FOR IMMEDIATE RELEASE

October 25, 2017

MEDIA CONTACT

press@everytown.org or 408.306.2604

**EVERYTOWN, MOMS DEMAND ACTION STATEMENTS
RESPONDING TO REPORT THAT NEW YORK DEPARTMENT OF
FINANCIAL SERVICES IS INVESTIGATING NRA CARRY GUARD
INSURANCE**

*The Wall Street Journal Reports that New York Department of Financial Services
Is Probing Shaky Legal Ground for NRA Carry Guard Insurance*

Probe is Based on Everytown Investigation and Analysis of Carry Guard

NEW YORK – Everytown for Gun Safety and Moms Demand Action for Gun Sense in America, part of Everytown, released the following statements today after the Wall Street Journal reported that the New York Department of Financial Services is investigating the legality of the NRA's marketing and fees in connection with its Carry Guard insurance product, including investigating the role of Chubb Insurance and Lockton Affinity. NRA Carry Guard promises to provide insurance coverage for legal and other costs for gun owners who shoot someone and claim self-defense.

The disclosure of the New York investigation follows an investigation and legal analysis of NRA Carry Guard by Everytown, which was shared with law enforcement and regulators in New York and elsewhere.

STATEMENT FROM ERIC TIRSCHWELL, LITIGATION DIRECTOR, EVERYTOWN FOR GUN SAFETY:

“The New York Department of Financial Services is right to investigate the NRA’s ‘Carry Guard’ insurance. Apart from the troubling nature of the product, there are serious legal questions about whether the NRA is violating insurance and possibly other consumer laws, which is why we shared our concerns with law enforcement and regulators.”

STATEMENT FROM SHANNON WATTS, FOUNDER OF MOMS DEMAND ACTION FOR GUN SENSE IN AMERICA:

“NRA Carry Guard proves that for the NRA’s leadership, no idea is too absurd, reckless or depraved. For years, NRA lobbyists have pushed to allow guns for anyone, anywhere, any time – no questions asked. Now they’ve figured out how to profit from gun owners concerned about being accused of murder. Carry Guard is just more proof that NRA leaders will do anything for money.”

The Everytown investigation into Carry Guard shared with regulators showed:

Beginning earlier this year, the NRA has been aggressively using the internet, emails, commercials and videos to promote NRA Carry Guard, a training and insurance program that purports to provide comprehensive insurance for gun owners who shoot someone and claim self-defense.

There is past legal precedent suggesting that organizations that are not licensed to sell insurance should use extreme caution in soliciting people to buy “affinity” insurance plans.

Based on the analysis of a recent federal appeals court decision (Friedman v. AARP) and Everytown’s investigation, the NRA may be violating California Insurance and Unfair Competition law – and possibly the insurance law of other states, including New York – by actively soliciting the purchase of Carry Guard insurance without being licensed to do so.

Examples of the explicit solicitation language the NRA has been using include “Get Carry Guard,” “Join Today,” “Sign up for NRA Carry Guard Today!,” “If you carry a gun you need this,” “I urge you to close this critical gap in your insurance coverage today,” and “Join the ranks.”

It is also possible the NRA is improperly receiving commissions and/or excessive compensation in connection with this insurance product.

For a one-year Bronze policy, the total annual charge is \$154.95, with an “Administrative/Membership Fee” that goes to the NRA of \$69.45, or about 45 percent of the total annual charge.

While that fee includes an annual NRA membership and some other minor perks, questions remain about whether the NRA is receiving an improper commission or excessive compensation.

About Everytown for Gun Safety

Everytown is the largest gun violence prevention organization in the country with more than three million supporters and more than 170,000 donors including moms, mayors, survivors and everyday Americans who are fighting for public safety measures that respect the Second Amendment and help save lives. At the core of Everytown are Mayors Against Illegal Guns, Moms Demand Action for Gun Sense in America and the Everytown Survivor Network. Learn more at www.everytown.org and follow us @Everytown

About Moms Demand Action for Gun Sense in America

Moms Demand Action for Gun Sense in America is a grassroots movement of Americans fighting for public safety measures that respect the Second Amendment and protect people from gun violence. Moms Demand Action campaigns for new and stronger solutions to lax gun laws and loopholes that jeopardize the safety of our children and families. Since its inception after the tragedy at Sandy Hook School, Moms Demand Action has established a chapter in every state of the country and, along with Mayors Against Illegal Guns and the Everytown Survivor Network, it is part of Everytown for Gun Safety, the largest gun violence prevention organization in the country with four million supporters and more than 170,000 donors. For more information or to get involved visit www.momsdemandaction.org. Follow us on Facebook at www.facebook.com/MomsDemandAction or on Twitter at @MomsDemand

###



P.O. Box 4184 | New York, NY 10017 US

This email was sent to mmcgough@everytown.org. To ensure that you continue receiving our emails, please add us to your address book or safe list.

[manage](#) your preferences | [opt out](#) using **TrueRemove®**.

Got this as a forward? [Sign up](#) to receive our future emails.



From: Loconte, Richard (DFS)
Sent: Wednesday, October 25, 2017 1:00 PM
To: etirschwell@everytown.org
Subject: RE:

Eric, I tried calling you back earlier. I can be reached today on my cell at 917.392.8415 – thanks

From: Loconte, Richard (DFS)
Sent: Tuesday, October 24, 2017 1:36 PM
To: etirschwell@everytown.org
Subject:

Hi Eric, Matt Levine provided me your email and suggested I reach out. Regarding our investigation into NRA and Carry Guard, would you be open to having me send media inquiries your way if we start getting calls?

Regards,
Rich

Richard Loconte
Executive Deputy Superintendent
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www.dfs.ny.gov

From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Friday, December 08, 2017 4:15 PM
To: Levine, Matthew (DFS)
Subject: Fwd: Photos

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Matt, here are some additional materials.

And the citation is:

https://scholar.google.com/scholar_case?case=8027532124808667217&q=838+p.2d+680&hl=en&as_sdt=6,33
(National Federation of Retired Persons v. Insurance Commissioner, 120 Wn.2d 101 (1992)).



Don't forget:
Join NRA Carry Guard today!

NRA  **CARRY GUARD**

**DON'T CARRY A GUN
WITHOUT CARRYING THIS.**

SIGN UP FOR NRA CARRY GUARD TODAY!

I hope you had a chance to read the free "Aftermath" guide we recently sent to you.

As someone who takes their personal security seriously, I know you'll value the crucial information in this guide.

But today, I want to tell you about the next step you need to take if you truly want to protect yourself, your loved ones, and your life's savings in the critical aftermath of a self-defense incident.

Because even if you do everything right, the truth is, you will likely still be arrested.

A bail bond can cost you up to \$100,000 above, and another \$50,000 to \$75,000 to retain a legal team. After all that...you can still get sued and be forced to pay civil or criminal court costs, attorney fees related to trial, testimony and witness fees...all totaling as much as \$500,000 or more.

You should never be forced to choose between defending your life...and putting yourself and your family in financial ruin.

But now you can get the affordable self-defense insurance protection YOU NEED so that you never have to face this nightmare scenario.

Introducing...

**NRA Carry Guard
Self-Defense Insurance Protection**



NRA has made it easy for you to obtain the most complete insurance protection for self-defense, personal firearm liability, and civil defense legal fees.

And it's affordable for everyone. You can have this comprehensive protection, which also includes automatic coverage for your spouse, for just pennies a day!

SIGN UP FOR NRA CARRY GUARD TODAY!

Or call 1-866-NRA-5050 to speak to one of our specialists who are standing by to assist you.

NRA Carry Guard gives you the protection you need if you're ever involved in a self-defense shooting.

Once you sign up for NRA Carry Guard Insurance, you'll have:

- 24/7/365 access to the members-only hotline for incident reporting and emergency assistance.
- Immediate access as needed to supplementary payments for bail, bonds, legal retainer fees, lawful replacement of your legally possessed firearm, compensation while in court, psychological support and property restoration costs.
- Full coverage for your spouse automatically at no extra charge. Each NRA Carry Guard member has his or her own insurance limit ranging from \$250,000 to \$1,000,000 depending on the level of coverage you choose.
- Civil defense legal fees in addition to the insurance limit for each membership level.
- Access to legal assistance and the ability to select your own counsel.
- Access to the most comprehensive training developed exclusively for private citizens who carry concealed firearms.
- Subscription to NRA Carry Guard quarterly publication.
- The full backing of America's strongest defender of individual freedom, the National Rifle Association.

SIGN UP FOR NRA CARRY GUARD TODAY!

You pay hundreds, even thousands of dollars every year to insure your home, your life, your vehicle, and your valuable possessions.

But unless you have the proper self-defense insurance that NRA Carry Guard provides, the moment you pull the trigger you'll set off a chain reaction of daunting and expensive legal costs that can bankrupt you and your family.

If it makes sense to insure your home, your vehicle, and your life – then it's a no-brainer to protect yourself and your family if you're ever drawn into a self-defense situation... which can be MUCH more costly.

THE PARTIES TO A DEFENSIVE SHOOTING

YOU—THE ARMED CITIZEN

As you begin coming down from the adrenaline rush, you will most likely feel a powerful inclination to talk about what just happened. **It is imperative that you limit what you say at this point.** Every word you say—to the 9-1-1 dispatcher, to bystanders or to the police—is able to be used against you. Even if the police find no evidence to support a criminal case against you, you might find yourself liable for damages in a civil lawsuit. **Say what is necessary and nothing more.**

THE 9-1-1 DISPATCHER

You should stay on the line with the emergency dispatcher—or allow someone else on the scene to do so—until the police arrive. They need to know where to find you, who is the suspect and who is the defensive shooter, so that they can relay this information to the police. Explaining yourself beyond these vital details can only put you at risk.

More photos from here:

<http://www.thetruthaboutguns.com/2017/04/daniel-zimmerman/nra-goes-big-carry-guard-insurance-program/>







From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Monday, February 12, 2018 8:29 AM
To: Levine, Matthew (DFS)
Subject: Contact info

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Hey Matt, good to see you the other night, you were going to send me contact info I could share, thanks.

Eric

--

ERIC TIRSCHWELL | DIRECTOR OF LITIGATION AND NATIONAL ENFORCEMENT POLICY
ETIRSCHWELL@EVERYTOWN.ORG 646-324-8222

EVERYTOWN FOR GUN SAFETY
EVERYTOWN.ORG | @EVERYTOWN

From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Monday, February 12, 2018 10:15 AM
To: Levine, Matthew (DFS)
Cc: Jacobi, Hadas (DFS); Prendergast, Megan B (DFS)
Subject: Re: Contact info/confidential

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Thanks, Hadas is there a direct dial for you?

On Feb 12, 2018, at 6:29 AM, Levine, Matthew (DFS) <Matthew.Levine@dfs.ny.gov> wrote:

Good to see you too
I'm connecting you with HadasJacobi who is handling this matter
Please provide her information to the Mass regulator
Thanks

Sent from my iPhone

On Feb 12, 2018, at 8:28 AM, Eric Tirschwell <etirschwell@everytown.org> wrote:

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From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Thursday, February 15, 2018 6:03 PM
To: Jacobi, Hadas (DFS)
Subject: RE: Contact info/confidential
Attachments: scan.pdf

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Attached is a recent article from Carry Guard Magazine that might be of interest.

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From: Jacobi, Hadas (DFS) [mailto:Hadas.Jacobi@dfs.ny.gov]
Sent: Thursday, February 15, 2018 9:55 AM
To: Eric Tirschwell
Subject: RE: Contact info/confidential

Eric,
My apologies for the delayed response – I've been out of the office with the flu the past week. My direct number is (212) 709-1662.
Thank you,
Hadas

Hadas A. Jacobi
Assistant Deputy Superintendent for Enforcement

New York State Department of Financial Services
One State Street Plaza
Executive Division, 19th Floor
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EVERYTOWN FOR GUN SAFETY
EVERYTOWN.ORG | @EVERYTOWN

From: Jacobi, Hadas (DFS)
Sent: Friday, February 16, 2018 12:59 PM
To: Eric Tirschwell
Subject: RE: Contact info/confidential

Thank you!

From: Eric Tirschwell [mailto:etirschwell@everytown.org]
Sent: Thursday, February 15, 2018 6:03 PM
To: Jacobi, Hadas (DFS) <Hadas.Jacobi@dfs.ny.gov>
Subject: RE: Contact info/confidential

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Sent: Monday, February 12, 2018 10:15 AM

To: Levine, Matthew (DFS) <Matthew.Levine@dfs.ny.gov>

Cc: Jacobi, Hadas (DFS) <Hadas.Jacobi@dfs.ny.gov>; Prendergast, Megan B (DFS) <Megan.Prendergast@dfs.ny.gov>

Subject: Re: Contact info/confidential

ATTENTION: This email came from an external source. Do not open attachments or click on links from unknown senders or unexpected emails.

Thanks, Hadas is there a direct dial for you?

On Feb 12, 2018, at 6:29 AM, Levine, Matthew (DFS) <Matthew.Levine@dfs.ny.gov> wrote:

Good to see you too

I'm connecting you with HadasJacobi who is handling this matter

Please provide her information to the Mass regulator

Thanks

Sent from my iPhone

On Feb 12, 2018, at 8:28 AM, Eric Tirschwell <etirschwell@everytown.org> wrote:

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Hey Matt, good to see you the other night, you were going to send me contact info I could share, thanks.

Eric

--

ERIC TIRSCHWELL | DIRECTOR OF LITIGATION AND NATIONAL ENFORCEMENT POLICY
ETIRSCHWELL@EVERYTOWN.ORG 646-324-8222

EVERYTOWN FOR GUN SAFETY
EVERYTOWN.ORG | @EVERYTOWN

From: Jacobi, Hadas (DFS)
Sent: Friday, February 16, 2018 12:59 PM
To: Eric Tirschwell
Subject: RE: Contact info/confidential

Thank you!

From: Eric Tirschwell [mailto:etirschwell@everytown.org]
Sent: Thursday, February 15, 2018 6:03 PM
To: Jacobi, Hadas (DFS) <Hadas.Jacobi@dfs.ny.gov>
Subject: RE: Contact info/confidential

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Attached is a recent article from Carry Guard Magazine that might be of interest.

ERIC TIRSCHWELL | DIRECTOR OF LITIGATION AND NATIONAL ENFORCEMENT POLICY
ETIRSCHWELL@EVERYTOWN.ORG 646-324-8222

EVERYTOWN FOR GUN SAFETY
EVERYTOWN.ORG | [@EVERYTOWN](https://twitter.com/EVERYTOWN)

From: Jacobi, Hadas (DFS) [mailto:Hadas.Jacobi@dfs.ny.gov]
Sent: Thursday, February 15, 2018 9:55 AM
To: Eric Tirschwell
Subject: RE: Contact info/confidential

Eric,

My apologies for the delayed response – I've been out of the office with the flu the past week. My direct number is (212) 709-1662.

Thank you,

Hadas

Hadas A. Jacobi
Assistant Deputy Superintendent for Enforcement

New York State Department of Financial Services
One State Street Plaza
Executive Division, 19th Floor
New York, NY 10004-1511
(212) 709-1662 | hadas.jacobi@dfs.ny.gov

www.dfs.ny.gov

From: Eric Tirschwell [<mailto:etirschwell@everytown.org>]
Sent: Monday, February 12, 2018 10:15 AM
To: Levine, Matthew (DFS) <Matthew.Levine@dfs.ny.gov>
Cc: Jacobi, Hadas (DFS) <Hadas.Jacobi@dfs.ny.gov>; Prendergast, Megan B (DFS) <Megan.Prendergast@dfs.ny.gov>
Subject: Re: Contact info/confidential

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ETIRSCHWELL@EVERYTOWN.ORG 646-324-8222

EVERYTOWN FOR GUN SAFETY
EVERYTOWN.ORG | @EVERYTOWN

From: Eric Tirschwell <etirschwell@everytown.org>
Sent: Friday, February 23, 2018 4:30 PM
To: Loconte, Richard (DFS)
Subject: Re: RE:

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FOR IMMEDIATE RELEASE

February 24, 2018

MEDIA CONTACT

press@everytown.org or 408.306.2604

**EVERYTOWN, MOMS DEMAND ACTION RESPOND TO
REPORT THAT CHUBB HAS DROPPED NRA CARRY
GUARD INSURANCE**

***Complaint Filed by Everytown Last October Led to New
York Department of Financial Services Probing Shaky
Legal Ground for NRA Carry Guard Insurance***

Moms Demand Action, Everytown Filed Complaints with Regulators in Six States about Legality of Carry Guard

In Wake of Mass Shooting in Parkland, Florida, a Wave of Companies Are Distancing Themselves from the NRA and Its Dangerous Agenda

NEW YORK – Everytown for Gun Safety and Moms Demand Action for Gun Sense in America, part of Everytown, responded today to a report Chubb is dropping NRA Carry Guard insurance, which promises to provide insurance coverage for legal and other costs for gun owners who shoot someone and claim self-defense. The move comes days after the mass shooting in Parkland, Florida, and four months after Everytown shared its investigation and legal analysis demonstrating that the NRA may be violating state law, which led the New York Department of Financial Services to investigate the legality of the NRA's marketing and fees in connection with Carry Guard, including investigating the role of Chubb Insurance and Lockton Affinity. The latest move part of a wave of corporate defections from the NRA and its dangerous agenda.

According to Reuters, Chubb notified regulators that it was dropping Carry Guard three months ago.

Everytown and Moms Demand Action began filing complaints against Carry Guard with regulators in six states four months ago. The New York investigation followed an Everytown investigation and legal analysis of NRA Carry Guard, which was shared with law enforcement and regulators in New York and elsewhere.

**STATEMENT FROM JOHN FEINBLATT, PRESIDENT,
EVERYTOWN FOR GUN SAFETY:**

“We applaud Chubb for dropping this dangerous product and urge Lockton Affinity to follow suit. Carry Guard is a dangerous and troubling product that risks encouraging those who carry guns to shoot first and ask questions later. For years, the NRA has pushed to allow guns for anyone, anywhere, anytime – no questions asked. With Carry Guard, the NRA has figured out how to profit from gun owners who are concerned about being accused of murder. Carry Guard is a danger to the American public, pure and simple.”

**STATEMENT FROM SHANNON WATTS, FOUNDER OF
MOMS DEMAND ACTION FOR GUN SENSE IN
AMERICA:**

"Moms Demand Action volunteers have asked Chubb for months to drop its affiliation with Carry Guard and finally, it has. This wave of NRA boycotts will not stop -- Americans have had enough of NRA lobbyists and their deadly agenda. Companies don't want to do business with the gun lobby, and lawmakers shouldn't either."

Just in the days since the mass shooting in Parkland, Florida, corporations have been publicly distancing themselves from the NRA and its dangerous policies. This week, First National Bank of Omaha announced that it was no longer issuing its NRA Visa card, as well as announcements that Enterprise Holdings, the parent company of National Car Rental, Alamo and Enterprise, ended their discount program for NRA members. Symantec, the software company behind LifeLock and Norton AntiVirus, has also cut ties with the NRA today.

Also today, Moms Demand Action announced a new #DumpNRATV campaign calling on Apple, Amazon, AT&T's DIRECTV, Google and Roku to stop including NRATV on their streaming platforms.

The Everytown investigation into Carry Guard shared with regulators showed:

- Beginning last year, the NRA has been aggressively using the internet, emails, commercials and videos

to promote NRA Carry Guard, a training and insurance program that purports to provide comprehensive insurance for gun owners who shoot someone and claim self-defense.

- There is past legal precedent suggesting that organizations that are not licensed to sell insurance should use extreme caution in soliciting people to buy “affinity” insurance plans.
- Based on the analysis of a recent federal appeals court decision (Friedman v. AARP) and Everytown’s investigation, the NRA may be violating California Insurance and Unfair Competition law – and possibly the insurance law of other states, including New York – by actively soliciting the purchase of Carry Guard insurance without being licensed to do so.
- Examples of the explicit solicitation language the NRA has been using include “Get Carry Guard,” “Join Today,” “Sign up for NRA Carry Guard Today!,” “If you carry a gun you need this,” “I urge

you to close this critical gap in your insurance coverage today,” and “Join the ranks.”

- It is also possible the NRA is improperly receiving commissions and/or excessive compensation in connection with this insurance product.
 - For a one-year Bronze policy, the total annual charge is \$154.95, with an “Administrative/Membership Fee” that goes to the NRA of \$69.45, or about 45 percent of the total annual charge.
 - While that fee includes an annual NRA membership and some other minor perks, questions remain about whether the NRA is receiving an improper commission or excessive compensation.

About Everytown for Gun Safety

Everytown is the largest gun violence prevention organization in the country with more than three million supporters and more than 170,000 donors including moms, mayors, survivors and everyday Americans who are fighting for public safety measures that respect the Second Amendment and help save lives. At the core of Everytown are Mayors Against Illegal Guns, Moms Demand Action for Gun Sense in America and the Everytown Survivor Network. Learn more at www.everytown.org and follow us @Everytown

About Moms Demand Action for Gun Sense in America

Moms Demand Action for Gun Sense in America is a grassroots movement of Americans fighting for public safety measures that respect the Second Amendment and protect people from gun violence. Moms Demand Action campaigns for new and stronger solutions to lax gun laws and loopholes that jeopardize the safety of our children and families. Since its inception after the tragedy at Sandy Hook School, Moms Demand Action has established a chapter in every state of the country and, along with Mayors Against Illegal Guns and the Everytown Survivor Network, it is part of Everytown for Gun Safety, the largest gun violence prevention organization in the country with four million supporters and more than 170,000 donors. For more information or to get involved visit www.momsdemandaction.org.

Follow us on Facebook at
www.facebook.com/MomsDemandAction or on Twitter
at @MomsDemand

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www.dfs.ny.gov

From: Loconte, Richard (DFS)
Sent: Friday, February 23, 2018 4:52 PM
To: Eric Tirschwell
Subject: RE: RE:

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From: Eric Tirschwell [mailto:etirschwell@everytown.org]
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To: Loconte, Richard (DFS) <Richard.Loconte@dfs.ny.gov>
Subject: Re: RE:

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FOR IMMEDIATE RELEASE

February 24, 2018



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From: Levine, Matthew (DFS)
Sent: Monday, August 06, 2018 11:30 AM
To: Eric Tirschwell
Subject: Free for a short call?

Matthew L. Levine
Executive Deputy Superintendent -- Enforcement

New York State Department of Financial Services
One State Street Plaza
Executive Division, 19th Floor
New York, NY 10004-1511
212-709-5461 matthew.levine@dfs.ny.gov

www.dfs.ny.gov